### KIRKLAND & ELLIS LLP

AND AFFILIATED PARTNERSHIPS

Stuart Drake
To Call Writer Directly:
+1 202 389 5094

1301 Pennsylvania Avenue, N.W. Washington, D.C. 20004 United States

+1 202 389 5000

Facsimile: +1 202 389 5200

www.kirkland.com

November 25, 2022

#### **BY ECF**

Honorable Jennifer E. Willis United States Magistrate Judge United States District Court Southern District of New York 500 Pearl St. New York, NY 10007

Re: International Refugee Assistance Project and Refugee and Immigrant Center for Education and Legal Services v. United States Customs and Border Protection, and United States Department of State, 20 Civ. 3202 (GBD) (JW)

#### Dear Judge Willis:

In accordance with the Court's August 9, 2020 Order, ECF No. 32, we write jointly on behalf of Plaintiffs International Refugee Assistance Project ("IRAP") and Refugee and Immigrant Center for Education and Legal Services and Defendants the United States Customs and Border Protection ("CBP") and the United States Department of State ("State Department") (collectively the "Parties") to update the Court on the status of the above-captioned matter.

Since the Parties reported to the Court on October 6, 2022, ECF No. 65, Defendants provide the following update regarding developments since the last status report:

In a November 16, 2022, letter, the State Department advised that it was continuing to process Plaintiffs' requests and had not at that time identified any additional responsive records. As the Parties advised in their August 30, 2021, letter, ECF No. 43, the documents being reviewed for the matter, *IRAP v. U.S. Department of State*, 20 Civ. 4728 (JPO), potentially overlap with the subject matter of the FOIA request at issue in this case, thus to the extent that any documents reviewed in connection with that case are also responsive in this matter, they will be produced. The State Department therefore plans to continue issuing responses in this case until its processing of *IRAP v. U.S. Department of State*, 20 Civ. 4728 (JPO), is complete.

The Parties will submit their next joint status report to the Court on or before January 24, 2023 in accordance with the Court's Order.

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#### Respectfully submitted,

KIRKLAND & ELLIS LLP

W. Neil Eggleston (Bar Code No. WE7674) Stuart Drake (*admitted PHV*)

/s/ Stuart Drake

1301 Pennsylvania Avenue NW Washington, D.C. 20004 (202) 389-5016 (Eggleston) (202) 389-5094 (Drake)

neil.eggleston@kirkland.com stuart.drake@kirkland.com

## INTERNATIONAL REFUGEE ASSISTANCE PROJECT

Adam T. Bates (*admitted PHV*) One Battery Park Plaza, 4th Floor New York, NY 10004 (516) 701-4209 abates@refugeerights.org

# REFUGEE AND IMMIGRANT CENTER FOR EDUCATION AND LEGAL SERVICES

Yvette Changuin (admitted PHV) 802 Kentucky Avenue San Antonio, TX 78201-6123 (210) 526-0042 Yvette.changuin@raicestexas.org Attorneys for Plaintiffs

#### DAMIAN WILLIAMS

United States Attorney

By: /s/ Dominika Tarczynska (by SD w/permission)

DOMINIKA TARCZYNSKA

Assistant United States Attorney

Tel. (212) 637-2748

Fax (212) 637-2686

dominika.tarczynska@usdoj.gov

Attorneys for Defendant